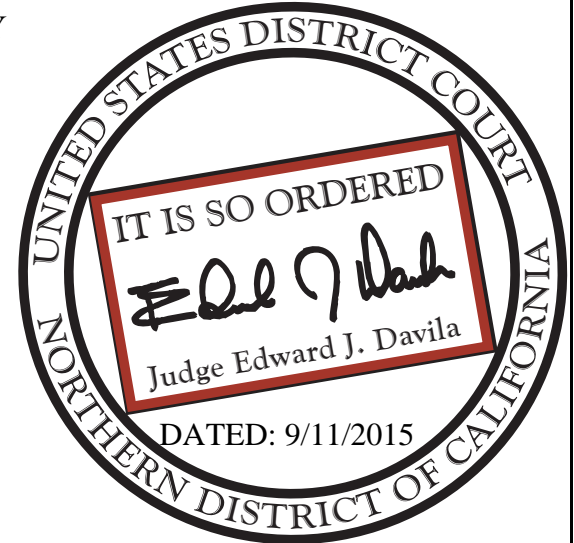


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NIA MUJADADI-TURAN



13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 NIA MUJADADI-TURAN

17 Plaintiff,

18 vs.

19 MOTOROLA MOBILITY, LLC;
METROPOLITAN LIFE INSURANCE
COMPANY

20 Defendants.
21

) Case No.: 05:15-cv-2752-EJD
)

) **Hon. Edward J. Davila**
)

) **JOINT STIPULATION TO CONTINUE**
) **DEADLINE FOR METLIFE TO**
) **RESPOND TO PLAINTIFF'S**
) **COMPLAINT**

) Complaint Filed: June 18, 2015

) Trial Date: TBD
)

JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and Defendant Metropolitan Life Insurance Company (“MetLife”), hereby jointly stipulate to an extension of time for MetLife to respond to Plaintiff’s Complaint. The Parties agree and stipulate that MetLife will respond to Plaintiff’s Complaint on or before October 12, 2015. In support of this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action against MetLife in the United States District Court for the Northern District of California. (*See* ECF Doc. No. 1).

2. MetLife was served with the Summons and Complaint in this action on June 26, 2015.

3. Pursuant to Fed. R. Civ. Proc. 12(a)(1)(A)(i), MetLife’s response to the Complaint was due on or before July 17, 2015.

4. The Parties submitted a stipulation to the Court agreeing to a thirty (30) day extension for MetLife to respond to the Complaint. Accordingly, MetLife’s response to the Complaint was due on or before August 17, 2015. (*See* ECF Doc. No. 11).

5. On August 11, 2015, Defendant Motorola Mobility, LLC (“Motorola”) and Plaintiff submitted a stipulation extending Motorola’s deadline to answer Plaintiff’s Complaint until September 10, 2015. (*See* ECF Doc. No. 13).

6. The Parties submitted a stipulation to the Court agreeing to an extension for MetLife to respond to Plaintiff’s Complaint. MetLife’s response to the Complaint was due on or before September 10, 2015. (*See* ECF Doc. No. 14).

7. The Parties are optimistic that a resolution can be reached in this matter, and the additional time will afford the Parties the opportunity to explore settlement opportunities

1 without incurring additional costs of litigation. Therefore, the Parties stipulate and agree to
2 extend MetLife's deadline to respond to Plaintiff's Complaint until October 12, 2015.

3
4
5 Date: September 10, 2015

MAYNARD, COOPER, & GALE, LLP

6 By: /s/ C. Andrew Kitchen
7 C. Andrew Kitchen
8 Attorneys for Defendant
9 METROPOLITAN LIFE INSURANCE
10 COMPANY

11 Date: September 10, 2015

KANTOR & KANTOR LLP

12 By: /s/ Glenn Kantor
13 GLENN KANTOR
14 Attorneys for Plaintiff
15 NIA MUJADADI-TURAN
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CERTIFICATE OF SERVICE

I am employed in the County of San Francisco State of California. I am over the age of eighteen years and not a party to this action. My business address is 275 Battery Street, Suite 1350, San Francisco, CA 94111. On September 10, 2015, I served a copy of the following documents:

JOINT STIPULATION TO CONTINUE DEADLINE FOR METLIFE TO RESPOND TO PLAINTIFF'S COMPLAINT

☒ CM/ECF ELECTRONIC SERVICE: The following are registered CM/ECF users with the Court, and have consented to service through the Court's automatic transmission of a notice of electronic filing.

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Attorneys for Defendant MOTOROLA MOBILITY, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on September 10, 2015, at San Francisco, California.



Mila Dunn